



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

Bruce Rauner, Governor
Wayne A. Rosenthal, Director

January 27, 2016

Rob Jones
4300 Market Pointe Drive
Minneapolis, MN 55435

RE: Enbridge Energy Lockport Fish Barrier Corrosion Monitoring System
Project Number(s): 1604934
County: Will

Dear Mr. Jones:

The Illinois Department of Natural Resources has reviewed the above-mentioned project involving installation of a corrosion monitoring system along Enbridge's Line 6A in response to stray electrical current from an electrical fish barrier installed across the shipping canal. The scope of work includes work at two locations within wetlands, herein referred to as Site 3 and Site 4. Pursuant to the Fish & Wildlife Coordination Act, the Department provides the following comments:

Records for the state and federally-endangered Hine's emerald dragonfly (*Somatochlora hineana*), state-endangered Blanding's turtle (*Emydoidea blandingii*), state-endangered spotted turtle (*Clemmys guttata*), and state and federally threatened northern long-eared bat (*Myotis septentrionalis*) occur in the project area. According to the documents provided, work at Site 3 will include a small excavation around an existing Enbridge test station. The excavation will be completed with a hand auger and will be limited to a 2-foot radius around the test station. Silt fence will be installed around the excavation. Work at Site 4 will require three 10-foot by 15-foot excavations to install IR drop junction boxes. Linear anodes and IR drop measuring leads will be installed on the south side of Line 6A and routed to an existing rectifier. Silt fence will be installed on both sides of the corridor and biologists will be placed around all spoil piles. Before work begins, a 50' x 450' section of the existing corridor will be mowed. Some tree clearing and trimming of overhanging limbs will also likely be required.

The Department notes in the plans that some work is proposed within the Romeoville Prairie Nature Preserve. The review for this portion of the project was previously completed under IDNR #1502301 by Keith Shank of this office and is being coordinated with the Illinois Nature Preserves Commission (letter attached).

Hine's Emerald Dragonfly

The Department concurs with the actions mentioned in the "Hine's Emerald Dragonfly Avoidance and Minimization Measures" document. However, you should seek concurrence on these measures from Kris Lah with the US Fish and Wildlife Service (USFWS) as well and copy the Department on the correspondences.

Blanding's Turtle & Spotted Turtle

The state-endangered Blanding's turtle and spotted turtle are known to occur in the vicinity of the proposed project area. The Department recommends the measures listed below are strictly adopted to help avoid "take" of these species. "Take" means, in reference to animals and animal products, to harm, hunt, shoot, pursue, lure, wound, kill, destroy, harass, gig, spear, ensnare, trap, capture, collect, or to attempt to engage in such a conduct.

- Try to complete the work before March 15 when the turtles become more active. If not possible, install exclusionary fencing by March 15 and maintain it through October 31 or until the project is complete. Be sure the fence is trenched into the ground to prevent turtles from entering construction areas and access roads. Inspect the fencing daily to ensure it remains properly installed and to check the species are not present;
- All on-site personnel involved in the project, including construction staff, should be educated on how to recognize these species. Color photos (of adults and juveniles), educational materials, and a plan for responding to potential encounters should be discussed in a training session and at the preconstruction site meeting(s);
- Routinely inspect the project areas before work begins to assure no turtles will be crushed by vehicles or during mowing or tree trimming.
- If any of the above species are identified within the construction area, crews should stop work immediately and allow the species to move out of the way or contact Dan Kirk, IDNR District Heritage Biologist, at 630-553-1372.


However, given the Blanding's turtle capture record is within the proposed work at Site 4, Enbridge should recognize that some risk of take may still be present depending on unforeseen circumstances which occur and the ability to strictly implement the above measures during the project. The Department recommends Enbridge consider Incidental Take Authorization (ITA) for both turtle species. Be advised, the ITA process can take up to four months to complete. Communication concerning the ITA application should be directed to Jenny Skufca, Office of Resource Conservation, 217-557-8243 or Jenny.Skufca@illinois.gov.

Northern Long-Eared Bat

The proposed plans call for some tree clearing to be completed. To avoid impacts to the northern long-eared bat, the Department recommends no tree clearing from April 1 through October 15. If this cannot be accommodated, the Department recommends a bat habitat assessment be completed and further coordination with the Department on the results.

The Department requests notification if these recommendations can be accommodated. Please note that this review is separate and distinct from any other action or regulatory authority of the Department. This review does not satisfy consultation requirements under Title 17 *Illinois Administrative Code* Part 1075.

Please contact me if you have any questions regarding this review.

A handwritten signature in black ink, appearing to read "Nathan Grider". The signature is written in a cursive, slightly slanted style.

Nathan Grider
Impact Assessment Section
217-785-5500

cc: Ron Abrant– USACE, Rock Island District
Jenny Skufca – IDNR, ORC
Keith Shank – IDNR, OREP